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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

YOANY VAILLANT,
a/k/a Yoany Vaillant Fajardo,
Defendant.

Case No. 2:22-cr-00030-RFB-DJA

**Stipulation to Continue Response and
Reply Deadlines for Four Weeks for
Defendant Vaillant's Motion to Sever
(ECF No. 100) (Third Stipulation to
Continue)**

Plaintiff United States of America, by and through its counsel, Jason M. Frierson,
United States Attorney, though Jessica Oliva, Assistant United States Attorney, and
Kenneth A. Polite, Jr. Assistant Attorney General, through Matthew A. Lamberti, Senior

Counsel; and Defendant Yoany Vaillant, by and through his counsel, Christopher R. Oram, Esq.; hereby stipulate and agree to continue the August 11, 2023 Response and the August 18, 2023 Reply deadlines as to Vaillant's Motion to Sever Defendant (ECF No. 100), to September 8, 2023 and September 15, 2023, respectively.

The parties enter this stipulation for the following reasons:

1. On June 16, 2023, Vaillant filed a Motion to Sever Defendant at ECF No. 100.

2. The parties filed a stipulation to extend the Response and Reply deadlines in order to allow for plea negotiations. The Court granted that stipulation and continued those deadlines to July 14 and July 21, 2023, respectively. ECF No. 102. The parties filed a stipulation to further extend those deadlines to allow plea negotiations to continue, which the Court granted, extending those deadlines to August 11 and August 18, 2023, respectively. ECF Nos. 112 and 113.

3. The parties are continuing to engage in plea negotiations and propose postponing the Response and Reply deadlines by an additional four weeks to allow this process to continue. The new Response deadline would be September 8, 2023, and the new Reply deadline would be September 15, 2023. Should the parties be successful, the Motion to Sever Defendant would become moot.

4. At a June 29, 2023 status conference, the Court expressed its intent to continue trial in this case to late February or early March of 2024. Accordingly, the parties' proposed briefing schedule would result in the issue being fully briefed more than 5 months prior to trial.

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5. Accordingly, good cause exists to continue the Response and Reply deadlines by an additional four weeks to permit the parties to engage in plea negotiations, which—if successful—would render the issue moot and thus preserve judicial resources.

Respectfully submitted this 10th day of August, 2023.

CHRISTOPHER R. ORAM, ESQ.

/s/ Christopher R. Oram
Counsel to Defendant
Yoany VAILLANT

JASON M. FRIERSON
United States Attorney

/s/ Jessica Oliva
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Assistant Attorney General

/s/ Matthew A. Lamberti
MATTHEW A. LAMBERTI
Senior Counsel
MICHAEL CHRISTIN
Trial Attorney
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IT IS SO ORDERED this 11th day of August, 2023.



HONORABLE RICHARD F. BOULWARE
DISTRICT COURT JUDGE